

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KIEFER
TO INTERROGATORY OF THE ASSOCIATION FOR POSTAL COMMERCE
(POSTCOM/USPS-T36-1a))

The United States Postal Service hereby files the response of witness Kiefer to the above-listed interrogatory part, filed on June 30, 2006 and due on July 14, 2006. The remaining interrogatories in the set, Interrogatory 1(b) to (i), 2, and 3 have been redirected to the Postal Service.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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August 2, 2006

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KIEFER TO
INTERROGATORY OF ASSOCIATION FOR POSTAL COMMERCE

POSTCOM/USPS-T36-1. Please refer to the copies of the DMM Advisories dated June 1, 2006 and June 29, 2006 attached to this document.

- a. Please confirm that you have used the same physical standards of the Standard Mail Automation flats, Not Flat-Machinables, and Parcels categories as indicated in these DMM Advisories in your rate design. If you cannot confirm, please explain why not.
- b. Does the Postal Service intend to incorporate the physical standards that have been specified in the attached DMM Advisories in the DMM? If so, when will the proposed and final rules be published?
- c. Does the Postal Service plan to establish or change any mailpiece characteristics, or rate eligibility or mail preparation requirements during the next eighteen calendar months, with respect to the following rate categories of Standard Mail Regular and Non-Profit Regular:
 - i. Automation Letters
 - ii. Automation Flats
 - iii. Non Flat-Machinables
 - iv. Machinable Parcels
 - v. Non-Machinable Parcels
- d. If not, please explain why not.
- e. If so, please describe any and all such changes.
- f. Will public input be sought during the development of any or all such additional characteristics or requirements? If not, why not?
- g. When will proposed rules addressing each change be published?
- h. When will final rules addressing each change be published?
- i. With respect to each change identified, does the Postal Service anticipate that it will increase its customers' costs to prepare mail? Why or why not?

RESPONSE:

- (a) For revenue estimation purposes I used the Nonletters redefinition matrix shown in my worksheet WP-STDREG-9. This matrix was prepared by witness Loetscher (USPS-T-28) from a mail characteristics study. Witness Loetscher informs me that the physical standards used in the mail characteristics study were the same as those published in the DMM Advisories.
- (b)-(i) Redirected to the Postal Service.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Nan K. McKenzie

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